

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

RECEIVED
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THOMAS H. GRIFF
CLERK, U.S. DISTRICT COURT
W.D. OF TN

TRACIE PUGH

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

SWANSON SERVICES CORP

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, TRACIE PUGH
(name of plaintiff)

is a citizen of the United States and resides at 5264 MILLBROOK RD
(street address)

MEMPHIS USA TENNESSEE
(city) (country) (state)
38116 (901) 335-3051
(zip code) (telephone number)

3. Defendant TRACIE RUGH

(defendant's name)

lives at, or its business is located at 5264 MILLBRANCH RD
(street address)

4. Plaintiff sought employment from the defendant or was employed by the defendant at

1645 BARTLETT RD

(street address)

MEMPHIS
(city)

USA
(country)

TENNESSEE
(state)

38134
(zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 09 01 2011

(day)

(month)

(year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 09 01 2011

(day)

(month)

(year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 09 01 2011

(day)

(month)

(year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 28 10 2011. (Attach a copy of the notice to this complaint.)
(day) (month) (year)

9. Because of plaintiff's (1) ☒ race, (2) ☐ color, (3) ☐ sex, (4) ☐ religion, (5) ☐ national origin, defendant

(a) ☐ failed to employ plaintiff.

(b) ☒ terminated plaintiff's employment.

(c) ☐ failed to promote plaintiff.

(d) ☐

10. The circumstances under which defendant discriminated against plaintiff were as follows:

VICE PRESIDENT OF OPERATIONS THOM CARDEAS
TOLD TRACIE PUGH WHILE IN A UNPROFESSIONAL RAGE
TO "SIT MY BLACK ASS DOWN" AFTER THE WORKPLACE
MANAGER DECIDED TO GRANT HER TO FOLLOW COMPANY
POLICIES AND PROCEDURES. MR. CARDEAS ALSO TOLD ME TRACIE
PUGH THAT I NEEDED TO CHILL MY DAMN SELF. I THEN
INFORMED THE DIRECTOR OF HUMAN RESOURCES LYNN WHITEFIELD
AND SHE SAID THOM CARDEAS WAS FRUSTRATED AND UNDER
A LOT OF PRESSURE. I TOLD LYNN WHITEFIELD THAT I UNDERSTOOD
FRUSTRATION. I SPENT 15 DAYS IN PORTLAND HOSPITAL DUE
TO HEALTH ISSUES AND DEALING WITH THOM CARDEAS AND HIS
RACIAL REMARKS TOWARDS MYSELF AND MY AFRICAN AMERICAN
STAFF. MY POSITION WAS ELIMINATED ON SEPT. 30, 2011.

11. The acts set forth in paragraph 9 of this complaint

- (a) ____ are still being committed by defendant.
- (b) ____ are no longer being committed by defendant.
- (c) ☒ may still be being committed by defendant.

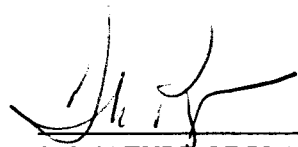
12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ____ Defendant be directed to employ plaintiff, or
- (b) ____ Defendant be directed to re-employ plaintiff, or
- (c) ____ Defendant be directed to promote plaintiff, or;
- (d) ☒ Defendant be directed to ~~the compensate plaintiff~~
~~the compensate plaintiff for such unprofessional~~
~~behavior~~ COMPENSATE PLAINTIFF FOR ALLOWING
SUCH UNPROFESSIONAL BEHAVIOR EVEN AFTER REPORTS
WERE FILED ON SEVERAL INSTANCES

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes (☒) No ()



SIGNATURE OF PLAINTIFF